



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JAN 23 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Charles Hiatt
Plant Manager
Twin City Foods, Inc.
P.O. Box 478
Ellensburg, Washington 98926

Re: Risk Management Program Compliance Inspection
Twin City Foods, Inc.
501 West 4th Avenue, Ellensburg, Washington
EPA Facility ID Number 1000 0008 2956

Dear Mr. Hiatt:

On September 17, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Twin City Foods, Inc. facility, located at 501 West 4th Avenue, Ellensburg, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Process Hazard Analysis [68.67]:** Twin City Foods failed to use one or more of the following techniques to conduct the initial PHA (1999) as required by 40 C.F.R. § 68.67(b).
 - What-if [68.67(b)(1)]
 - Checklist [68.67(b)(2)]
 - What-if/Checklist [68.67(b)(3)]
 - Hazard and Operability Study (HAZOP) [68.67(b)(4)]
 - Failure Mode and Effects Analysis (FMEA) [68.67(b)(5)]
 - Fault Tree Analysis [68.67(b)(6)]
 - An appropriate equivalent methodology [68.67(b)(7)]
2. **Process Hazard Analysis [68.67]:** Twin City Foods' initial PHA (1999) failed to indicate that it was performed by a team with expertise in engineering and process operations and did not include appropriate personnel as required by 40 C.F.R. § 68.67(d).

On September 25, 2014, Twin City Foods provided a copy of the initial 1999 PHA. Twin City Foods must retain the process hazard analyses for the life of the process as required by 40 C.F.R. § 68.67(g).

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at:

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at 206-553-1255 or morales.javier@epa.gov.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit